

Yacovone, Krista

From: DiPippo, Gary <Gary.DiPippo@Cornerstoneeg.com>
Sent: Tuesday, January 06, 2015 9:01 AM
To: Gorin, Jonathan
Cc: Cardiello, Frank; Scott MacMillin (SMacMillin@brwncald.com); dtoft@wolffsamson.com; relampkin@ashland.com; Anne.Pavelka@dep.state.nj.us; John M. Hoffman; Carrie McGowan
Subject: LCP, 4th Quarter 2014, Progress Report
Attachments: L010615JG(Q4_2014)ProgRep.pdf

Good morning Jon.

On behalf of IES, attached is the fourth quarter of 2014 progress report for the LCP Chemicals, Inc. Superfund site. Paper copies will be sent via US Mail.

Please contact either John Hoffman of Ashland Inc. or me, should you have questions or comments.

Thank you

Gary DiPippo

Region Vice President



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VIA E-MAIL AND US MAIL

January 6, 2015

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region 2
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: 4th Quarter 2014 Progress Report
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Consent Order) issued by USEPA and as executed by IES on May 13, 1999. On February 4, 2014, IES requested a change in the reporting frequency required by the Consent Order from monthly to quarterly, and in an electronic mail message dated February 4, 2014, the USEPA approved of the change. This is the fourth quarter progress report, for the period from October 1 to December 31, 2014.

A "Gantt Chart" project schedule has been provided as an attachment to past progress reports. However, as indicated in the progress report for August 2013, with the USEPA's approval in August 2013 of the *Remedial Investigation Report (RIR)*, *Human Health Risk Assessment (HHRA)*, *Baseline Ecological Risk Assessment (BERA)*, and *Feasibility Study (FS)*, the work requirements of the Statement of Work (SOW) in the Consent Order have been met. Therefore, no specific future actions have been defined at this point for which a schedule can be shown. As such, a schedule is not included with this progress report, although if specific future actions consistent with the Consent Order are defined, a schedule will be added to subsequent progress reports.

1. Previous Actions in Compliance with the Order

- A. The following actions were taken to comply with the Order during the previous reporting period:
 - Since the specific work requirements of the Consent Order have been completed and approved, the only continuing work has been ongoing coordination with the USEPA. During this reporting period the coordination activities between Ashland and USEPA continued with respect to the form and content of a Consent Order or modification of the existing Consent Order that would govern any ongoing activities.
- B. The following documents were submitted to the agencies during the previous reporting period:
 - Quarterly progress letter report dated October 3, 2014.
- C. The following agency approvals were received during the previous reporting period:
 - None during the reporting period.
- D. The following agency documents and correspondences were received during the previous reporting period:
 - None during the reporting period.
- E. Other pertinent communications with the agencies during the previous reporting period:
 - None during the reporting period.

2. Future Actions, Data, and Plans

- A. As previously noted, with the USEPA approval of the RIR, HHRA, BERA, and FS, the RI/FS work requirements of the Consent Order have been met, and therefore, no specific future actions have been defined at this point. Discussions are ongoing with the USEPA regarding the possibility of performing certain remedial activities, such as the pre-design treatability study, under an amendment to the existing Consent Order.
- B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

- A. As noted above, there are not any work items for which a schedule is currently defined, and therefore, a schedule is not included with this progress report. If future work items consistent with the Consent Order are defined in the future, an updated schedule will be prepared and included with the progress report.
- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
 - The work required by the Consent Order is completed.
- C. Description of efforts made to mitigate these delays or anticipated delays:
 - The work required by the Consent Order is completed.

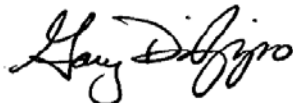
4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

CORNERSTONE ENGINEERING GROUP, LLC



Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, EHS Support
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
F. Cardiello, Esq., USEPA	D. Toft, Esq.
A. Pavelka, NJDEP	R. Lampkin, Ashland